

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

G.T., by and through next friend)
LILIANA T. HANLON, individually and)
on behalf of all others similarly situated,)
)
)
 Plaintiff,) Case No. 1:21-cv-04976
)
 v.) Hon. Martha M. Pacold
SAMSUNG ELECTRONICS AMERICA,)
INC.,)
)
)
 Defendant.)

**Notice of Withdrawal of Samsung's Motion to Compel Arbitration; Stipulation
Regarding Motion to Dismiss Briefing**

Plaintiff G.T. and Defendant Samsung Electronics America, Inc. ("Samsung") hereby stipulate to Samsung's withdrawal of its currently-pending Motion to Compel Arbitration and Dismiss, or, in the Alternative, Stay Proceedings (ECF No. 17) and further stipulate to a schedule related to briefing Samsung's anticipated motion to dismiss the pending Amended Complaint under Federal Rule of Civil Procedure 12(b)(6). Specifically, the Parties stipulate as follows:

1. Samsung hereby withdraws its pending motion to compel arbitration of Plaintiff G.T.'s claims. *See* ECF No. 17.

2. Samsung shall have until October 21, 2022, four weeks from the date of this stipulation, to file its anticipated motion to dismiss.

3. The Parties further agree that Plaintiff shall have until December 2, 2022 to file any opposition to Samsung's motion to dismiss, and Samsung shall have until December 16, 2022 to file its reply.

4. Pursuant to the Court's standing order regarding motion practice, this is the first extension request related to Samsung's motion to dismiss, and no party objects to the extension.

WHEREFORE, the Parties respectfully request that the Court enter an Order: (A) noting Samsung's motion to compel arbitration of Plaintiff G.T.'s claims has been withdrawn; (B) extending the time for Samsung to file its motion to dismiss by four weeks, up to and including October 21, 2022; (C) extending the time for Plaintiff to file her opposition until December 2, 2022; and (D) extending the time for Samsung to file its reply until December 16, 2022.

Dated: September 23, 2022

Respectfully submitted,

/s/ Keith J. Keogh

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